

Piggott, Amelia

From: Way, Steven
Sent: Saturday, September 05, 2015 5:36 PM
To: Piggott, Amelia
Subject: FW: Rico/Stormwater Questions - FYI and Records File

Hello Amelia,

When you have time, please include this in the records for the site. If you have any comments on this topic, please let me know.

Thanks,
Steve

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From: Brown, Anthony R (RM) [mailto:anthony.brown@bp.com]
Sent: Saturday, September 05, 2015 3:48 PM
To: 'Rudolph - CDPHE, Mark' (mark.rudolph@state.co.us); Sanchez, Christopher (ANDERSON ENGINEERING); bloomis@andersoneng.com
Cc: Way, Steven; Moore, Terry J; Sandy Riese; Yadon, Douglas; Nebel, Emily (Contractor)
Subject: Rico/Stormwater Questions

Hi Mark - the below information should be helpful regarding stormwater at Rico – sorry for the delayed response – busy summer season - hope this helps... Tony...

Stormwater at the Rico-Argentine Project Site is managed in accordance with a comprehensive Stormwater Management Plan (SWMP). The SWMP identifies best management practices (BMPs) for minimizing or reducing erosion, sediment transport, and contact between stormwater and potential pollutant source areas at the site. Although CERCLA Section 121(e) exempts onsite response actions from the need to obtain a CDPS stormwater permit, the SWMP was developed to comply with the substantive requirements in CDPHE's General Permit for Stormwater Discharges Associated with Construction (COR-030000). In addition to the SWMP, the Engineering Design and Operations Plan for the Solids Repository, which was reviewed and approved by CDPHE's Hazardous Materials and Waste Management Division, also contains detailed plans for stormwater controls that have been integrated into the design and construction of that facility.

The SWMP includes information addressing the following items, among others: a detailed project description, sequence of project activities, estimated area of disturbance, erosion potential, potential pollution sources, non-stormwater discharges, receiving waters and outfalls, BMPs, erosion and sediment controls, spill prevention, and final stabilization plans. It also lays out Atlantic Richfield's program for inspecting and maintaining BMPs and other erosion and sediment controls, documenting inspections and follow-up activities, and modifying and updating the SWMP as needed. The SWMP includes site maps, drainage and grading plans, BMP design drawings, and stormwater inspection

forms. We also maintain a log of completed inspection reports, which document both observations made during stormwater inspections and maintenance or repairs performed as follow-up to the inspections.

Pursuant to the SWMP, BMPs and erosion and sediment controls are used to minimize contact between stormwater and potential pollutant sources at the site. Managed stormwater that comes into contact with disturbed soils, including soils disturbed during current construction activities or historic mining and minerals processing, is directed to the on-site network of settling ponds prior to entering the Dolores River. Berms, channels, ditches, and other BMPs described and mapped in the SWMP are used for run-on and run-off control and direct stormwater either away from disturbed areas or towards the settling ponds, as appropriate. Again, sediment transport and erosion are controlled through BMPs described in the SWMP. Sediment carried by stormwater that cannot be diverted away from disturbed areas settles out in the ponds. Although stormwater is routed to the settling ponds, stormwater does not enter the components of the engineered wetland treatment system being used to treat a portion of the discharge from the St. Louis Tunnel. Now and in the future, stormwater mixes with the treated effluent after it exits the constructed wetlands, as it enters the lower settling ponds and before it discharges to the Dolores River.

Hopefully this email addresses the WQCD's questions. Feel free to contact me if you or the WQCD need additional information. We can also provide copies of the SWMP, inspection reports, and EDOP if so requested (Chris/Ben – provide the materials should Mark want copies).

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From: Rudolph - CDPHE, Mark [<mailto:mark.rudolph@state.co.us>]
Sent: Thursday, August 13, 2015 6:08 AM
To: Brown, Anthony R (RM); Pokorny, Luke N
Subject: Permits Section Question

Tony and Luke,

As part of the WQ program getting up to speed and after the AOC is finished with Steve Way, we are all hoping that being able to transition over from EPA AOC to CDPHE WQ permit. The WQ program had some questions regarding site management etc... that they asked me that I was not familiar with an answer. Can you get back on these if your able to answer.

1. how stormwater flows/discharges at the site, and what pollutant sources it contacts at the facility (topsoil; overburden; waster rock; tailings; raw ore).
2. what type of treatment the stormwater receives, such as mechanical treatment; sediment ponds; construction type BMPs; etc.
3. whether the stormwater commingles with the 'process' water Eric's permit will address, or is discharged from different outfalls (including sheet flow).

Thanks

Mark

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